



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
222 S. Houston, Suite A
Tulsa, Oklahoma 74127

July 7, 1995

Ms. Andrea Beard, HRMLIS Acting Section Head (H7505W)
Registration Support Branch, Registration Division/OPP
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460

Dear Ms. Beard:

This letter is in regard to the Section 18 - Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) request, dated June 13, 1995, by the Oklahoma Department of Agriculture, and the subsequent approval, dated June 29, 1995, by the U. S. Environmental Protection Agency (EPA) for the use of flowable carbofuran on cotton in Oklahoma.

The U. S. Fish and Wildlife Service (Service) is opposed to the issuance of this specific exemption because the use of flowable carbofuran under the specified conditions poses an unreasonable adverse risk to fish and wildlife resources over a wide area in Oklahoma. EPA is aware that carbofuran is extremely toxic to terrestrial and aquatic fauna, and that numerous wildlife mortalities have been attributed to field applications of the proposed formulation, Furadan 4F®.

FMC Corporation's own field studies have shown mortalities among a wide range of non-target species, including numerous species of migratory birds. In these and other documented studies, extensive mortality has occurred when applications were made in accordance with label instructions, and even when specific so-called risk reduction measures were used.

In short, we believe that EPA has in its possession, and has complete knowledge of, sufficient information on the hazards of carbofuran to have warranted denial of the subject Section 18 request on the basis that the benefits derived do not outweigh the risks involved. The Service's position is that the continued losses of birds, and the risk to endangered species, from exposure to this pesticide are contrary to established mandates, as well as scientific evidence, and that EPA, as the regulatory agency, is responsible for the cumulative losses that occur from this action.

We further contend that the surveillance monitoring program for detecting wildlife mortality, as described on pages 4-6 of the subject petition, does not follow EPA's own guidelines and has no real value. In the event that treatment-related mortalities are discovered, what actions are to be taken? These cases will represent a small, unknown percentage of actual mortalities that merely affirm what currently is common knowledge. If no mortality is discovered, this is hardly evidence that carbofuran is safe, in light of the voluminous body of credible data to the contrary.

Ms. Andrea Beard
Section 18 - Carbofuran

2

The Oklahoma Department of Agriculture should be required to conduct an evaluation of the effects of this proposed treatment that has scientific merit and is in accordance with established regulatory guidelines.

If you have questions regarding these comments, please contact Dr. Dan Martin of this office at (918) 581-7458.

Sincerely,



Jerry J. Brubander
State Supervisor

DBM:dm:EQ/CARBOFUR